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## MEMORANDUM

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TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/lg/78 DATE: February 28, 2007  
RRG/Clayton Site Technical Committee

C.C.: P. Harvey  
R. Shepherd  
B. Schloessler

RE: Status Report # 16 for the Resource Recovery Group/Clayton Chemical Company Site

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This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this sixteenth Monthly Status Report is January 26, 2007, through February 23, 2007.

### EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (the Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 15 was submitted to U.S. EPA on February 1, 2007.

Also, please note that in Status Report # 15 it was inadvertently stated that Status Report # 14 was submitted to U.S. EPA on December 30, 2006. The report was actually submitted on January 1, 2007, a detail which was presented in the Weekly Summary Report for the week of January 1 - 5, 2007.

### 1.0 COMPLETED ACTIVITIES

#### 1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities completed during the reporting period centered on completing the waste removal process at the Site. Field activities, which were completed from February 5 through 7, 2007, consisted of the loading and off Site shipment of the remaining treated mixed waste (Resources Conservation and Recovery Act [RCRA] and Toxic Substance Control Act [TSCA]) soils from stockpile 4/4B; the loading of the materials from the EZ 4 loading dock; the backfilling of the excavations created by the loading out of the EZ 4 material, the stockpile 4/4B soils, and the remaining depression caused by the GP-2 excavation; and completing Site restoration activities to the extent practical prior to demobilizing from the Site for the week. Off Site

activities completed for the project were primarily related to making the necessary arrangements to have the treated mixed waste soils removed from the Site for disposal; determining the best approach to manage the remaining drums of waste (thirty-seven [37] drums of previously designated non-hazardous materials and two [2] drums of hazardous tank 3 materials); making the necessary arrangements for the loading and shipment of the EZ 4 loading dock materials; and completing reporting activities. Additional details of the completed tasks are provided for review in this report.

A weekly summary of activities appears below:

- During the week of January 29, 2006 (January 29 – February 2, 2007), the primary activities that were completed centered on Conestoga-Rovers & Associates' (CRA's) attempts to arrange for the off Site disposal of Site wastes (treated stockpile # 4/4B soils and drummed wastes) from the Site. No actual field activities were performed during the week primarily since the waste disposal activities were the primary remaining Site task;
- The primary activities completed during the week of February 5, 2007 involved the loading of Site soils; and the restoration of the areas where these soils were removed from. A total of sixteen (16) loads of treated stockpile # 4/4B soils were loaded and shipped off Site on Monday, February 5 (12 loads) and Wednesday, February 7 (4 loads). Other completed tasks included the excavation of impacted materials (soil, drum carcasses and dried paint sludge) from the EZ 4 loading dock area and the placement of these materials into eight (8) 20-cubic yard (yd<sup>3</sup>) roll off boxes for future off Site transport and disposal; and the restoration of the depression caused by the removal of the stockpile # 4/4B and EZ 4 loading dock materials using a CA-6 type limestone-based gravel backfill. This CA-6 material was also used to complete backfilling activities at the GP-2 excavation area, which had been partially (roughly 95%) filled during the week of December 20, 2006. Ten (10) loads of this granular backfill, weighing roughly 266 tons, were used for this activity, which was completed on February 7, 2007;
- For the week of February 12, 2007, the primary focus of Site-related activities involved trying to determine/resolve material management issues for the remaining Site wastes. CRA continued discussion with Veolia to determine the shipment schedule for the roll off boxes containing the excavated materials from the EZ 4 loading dock. Additionally, CRA continued efforts to determine the most feasible management option to address the thirty-seven (37) drums of non-hazardous waste that were present in the Waste Drum Storage Building at the beginning of the project; and
- The activities performed for the Site during the week of February 19, 2007 consisted of the continued dialog between CRA and Veolia regarding the scheduling of the removal of the EZ 4 loading dock materials and the management of the drummed wastes. No on Site activities were performed during the week.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for January 29 – February 2, 2007; Appendix B – Weekly Summary of Site Activities for February 5– 9, 2007; Appendix C – Weekly Summary of Site Activities for February 12 - 16, 2006; and Appendix D – Weekly Summary of Site Activities for February 19 – 23, 2007.

## **1.2 SAMPLING AND ANALYSIS**

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006.

During the reporting period, no sampling activities were performed at the Site.

The only analytical data received by CRA during the reporting period consisted of analytical results obtained from U.S. EPA Region V Remedial Project Manager (RPM), Timothy Fischer. The data provided by RPM Fischer were the groundwater sample results from the Sauget Area 2 Phase 2 Groundwater Sampling activities that were completed in June and July of 2006. Since these data were provided by U.S. EPA, they are not being included in this report. The analytical data supplied by RPM Fischer were received on February 14, 2007.

## **1.3 REMOVAL ACTION WORK**

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through D of this report.

## **2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS**

No significant technical problems were encountered during the reporting period. Similarly, no problems or issues are anticipated for the upcoming period.

## **3.0 ANALYTICAL DATA GENERATED/RECEIVED**

As stated in Section 1.2, no environmental or waste characterization samples were collected at the RRG/Clayton Site during the reporting period. As such, no resultant analytical results were generated. Additionally, no analytical results were obtained during the reporting period for samples previously collected by CRA, Brandenburg or any other person(s) acting on behalf of or for the benefit of The Respondents.

## **4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD**

### **4.1 SITE PLANS**

During the upcoming reporting period (February 26, 2007, through March 23, 2007), the following activities are anticipated:

- Waste characterization sample collection activities for the previously designated non-hazardous drummed materials;
- The shipment of all remaining waste materials (EZ 4 loading dock soils and drummed wastes) for off Site disposal will be completed;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the remaining removal activities and weather conditions; and
- Site restoration activities, weather permitting, will be initiated.

#### **4.2 SAMPLING AND ANALYSIS**

During the upcoming reporting period, the only anticipated sampling activity will involve the collection of waste characterization samples from the drums of previously designated non-hazardous materials at the Site. These samples will be collected by personnel from Veolia Environmental Services, Inc. (Veolia), under the observation of CRA, and will be analyzed by the on Site laboratory at the Veolia Trade Waste Incinerator (TWI) facility in Sauget, Illinois.

#### **4.3 REMOVAL ACTION WORK**

Among the activities expected to be performed and/or completed during the upcoming report period are waste characterization sampling, the assembly and shipment of hazardous and non-hazardous wastes and limited Site restoration activities. An anticipated schedule for these activities appears below.

#### **5.0 ANTICIPATED SCHEDULE**

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	February 26, 2007
Complete Characterization of Drummed Wastes	Ongoing/30 days	February 26, 2007
Arrange For Transportation and Disposal of Drummed Wastes	Ongoing/30 days	February 26, 2007
Continue Technical Design, and Construction Scheduling of Proposed Landfill Cap	Ongoing/30 days	February 26, 2007
Arrange For Transportation and Disposal of EZ 4 Loading Dock Materials/Wastes	Ongoing/30 days	February 26, 2007
Initiate Site Restoration Activities	Ongoing/30 days	February 26, 2007
Submit Status Report # 17	1 day	March 28, 2007
Attachments		

FIGURE 1

SITE MAP



APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 29 - FEBRUARY 2, 2007



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& ASSOCIATES**

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## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/77 DATE: February 28, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For January 29 - February 2, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the sixty-first week (the period January 29 through February 2, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 29, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. CRA informed START Bob Hill that CRA and Brandenburg Industrial Service Company (BISCo) are tentatively planning to re-mobilize to the Site the week of January 29, 2007
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Waste Management (WM) regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006



<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 29, 2007	Soil Sampling/Excavation	No on Site activity. CRA continued discussions with EQ regarding the scheduling of shipments to remove the treated stockpile 4/4B soils from the Site
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 30, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site activity
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continued discussions with EQ regarding the scheduling of shipments to remove the treated stockpile 4/4B soils from the Site
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 31, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 31, 2007	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility. WM informs CRA that additional analytical data will be needed for waste approval process to be completed
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continued discussions with EQ regarding the scheduling of shipments to remove the treated stockpile 4/4B soils from the Site
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 1, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted Status Report # 15 to U.S. EPA via electronic mail. CRA contacted Tim Fischer, the Remedial Project manager (RPM) for the Sauget Area 2 Site, and requested a copy of the groundwater data from July 2006 sampling event. RPM Fischer said that a CD-ROM containing the data would be sent
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continued discussions with EQ regarding the scheduling of shipments to remove the treated stockpile 4/4B soils from the Site

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 1, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 2, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. CRA informed START Bob Hill of Site re-mobilization scheduled for Monday, February 5 <sup>th</sup>
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility. CRA also contacts Veolia regarding the possible disposal options for the non-hazardous drummed waste at the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. EQ and CRA confirm remobilization on February 5, 2007 to begin loading and shipment of the treated stockpile 4/4B soils
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



## APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR FEBRUARY 5 - 9, 2007



**CONESTOGA-ROVERS  
& ASSOCIATES**

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## MEMORANDUM

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TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/76 DATE: February 28, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For February 5 - 9, 2007

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Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the sixty-second week (the period February 5 through February 9, 2007) is presented below.

Date	Tasks	Activity
February 5, 2007	Mobilization Activities	Conestoga-Rovers & Associates (CRA) and Brandenburg Industrial Service Company (BISCo) mobilized to the Site. A total of 4 20-cubic yard (yd <sup>3</sup> ) roll off boxes were delivered to the Site by Midwest Trucking (contracted through Veolia) for loading the EZ 4 Loading Dock material
	Project Coordination	START Bob Hill was present on Site to observe soil removal activities
	Site Preparation	BISCo prepared select pieces of equipment for demobilization. Midwest Trucking staged the roll off boxes near EZ 4 loading dock for material load out
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. BISCo and CRA confirmed that the 2 tank 3 drums remained at the Site during the drum inventory

Date	Tasks	Activity
February 5, 2007	Drum Characterization/Disposal	BISCo and CRA inventoried the remaining drums at the Site. A total of 37 non-hazardous drums were counted. CRA continued discussions with Veolia regarding disposal options for the remaining drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	A total of 12 loads, approximately 22 tons each, of soil from Stockpile #4/4B was hauled off Site by Beelman Truck Company for delivery to the EQ Wayne Disposal Facility in Belleville, Michigan
	Miscellaneous	CRA and BISCo made preparations to load the materials from the EZ 4 loading dock into roll off boxes for off Site disposal
February 6, 2007	Mobilization Activities	BISCo-owned equipment (mini-excavator, mix boxes, decontamination trailer) and supplies (PPE, office equipment, decontamination supplies, hydration supplies, unused 55-gallon drums, unused rolls of plastic sheeting) were demobilized from the Site. Midwest Trucking delivered 2 additional 20-yd <sup>3</sup> roll off boxes to the Site for EZ 4 Loading dock material load out
	Project Coordination	START Bob Hill was on Site to observe field activities
	Site Preparation	BISCo staged the 2 roll off boxes delivered to the Site on February 6 <sup>th</sup> at the EZ 4 Loading Dock area for filling
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal options for the tank 3 drums
	Drum Characterization/Disposal	CRA continued discussions with Veolia regarding disposal options for the remaining drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
February 6, 2007	Soil Sampling/Excavation	BISCo arranged for the delivery of backfill material (a limestone-based CA-6 gravel) to be delivered to the Site on February 7 <sup>th</sup> to restore the stockpile 4/4B area following soil load out. The material will also be used to complete backfilling of the GP-2 excavation
	Miscellaneous	BISCo loaded soil, drum carcasses, and concrete debris from the EZ 4 Loading Dock into the 6 roll off boxes delivered to the Site by Midwest Trucking. Materials in the target area were excavated to approximately 3.5-4 feet below ground surface and created an excavation approximately 20 feet wide by 40 feet long. At the end of the day, enough soil to fill 2 additional roll off boxes remained in the excavation. CRA ordered 2 additional roll off boxes from Midwest Trucking through Veolia for delivery to the Site on February 7 <sup>th</sup> . Grossman Steel picked up a roll off box containing scrap steel from the Site
February 7, 2007	Mobilization Activities	10 loads (roughly 266 tons) of backfill material (CA-6 gravel) were delivered to the Site from Columbia Quarry Company of Columbia, Illinois by Beelman Truck Company. Midwest Trucking delivered 2 additional 20-yd <sup>3</sup> roll off boxes to the Site for EZ 4 Loading dock material load out. Additional BISCo-owned equipment and supplies were demobilized from the Site. BISCo and CRA personnel demobilized from the Site at the end of the day
	Project Coordination	START Bob Hill on Site to observe soil loading, backfilling, and demobilization activities. IEPA Mike Grant was on Site to observe the soil excavation/load out operation for the EZ 4 loading dock
	Site Preparation	BISCo completed general Site clean up activities in preparation of demobilization
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity
	Drum Characterization/Disposal	CRA continued discussions with Veolia regarding disposal options for the remaining drums on Site. An overpack drum was picked up from Veolia for the re-packaging of a plastic drum staged on the former Tank G5 tank pad



Date	Tasks	Activity
February 7, 2007	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo loaded 4 additional trucks from Beelman Trucking with soils from stockpile 4/4B for transport to the EQ Wayne facility in Belleville, Michigan. Site restoration activities were continued with the completion of backfilling activities for the GP-2 excavation (3.5 loads) and for the former stockpile 2/current stockpile 4/4B area (3 loads)
	Miscellaneous	BISCo completed soil removal activities for the EZ 4 Loading Dock material by excavating and loading 2 additional roll off boxes, making a total of 8 roll off boxes filled. The resultant depression from the over excavation of the materials from the loading dock was backfilled with CA-6 gravel(3.5 loads) to grade
February 8, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents responded to the January 29, 2007, e-mail from U.S. EPA regarding the proposed protocol for the Waste Drum Storage Building loading dock investigation
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off Site on 02/08/06
	AST Sampling/Cleaning Removal	No on Site activity. CRA continued discussions with Veolia regarding disposal options for the remaining drums of tank 3 material on Site
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for the remaining drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
February 9, 2007	Mobilization Activities	No activity

Date	Tasks	Activity
February 9, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities. CRA forwarded photographs of the EZ 4 loading dock activities to IEPA Mike Grant and START Bob Hill
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off Site on 02/08/06
	AST Sampling/Cleaning Removal	No on Site activity. CRA continued discussions with Veolia regarding disposal options for the remaining drums of tank 3 material on Site
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for the remaining drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA forwarded the Site survey data collected on November 2, 2006, to the CRA Design Group to continue development of the proposed landfill cap design

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

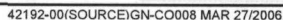


figure 1

SITE WORKZONE LAYOUT MAP  
RRG CLAYTON CHEMICAL  
*Sauget, Illinois*

## APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR FEBRUARY 12 - 16, 2007



**CONESTOGA-ROVERS  
& ASSOCIATES**

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www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/75 DATE: February 26, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For February 12 - 16, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the sixty-third week (the period February 12 through February 16, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 12, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 12, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the disposal of the EZ 4 Loading Dock soils
February 13, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 14, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. CRA received groundwater analytical data from the July Sauget Area 2 RI/FS sampling event from Tim Fischer, the Remedial Project manager (RPM) for the Sauget Area 2 Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

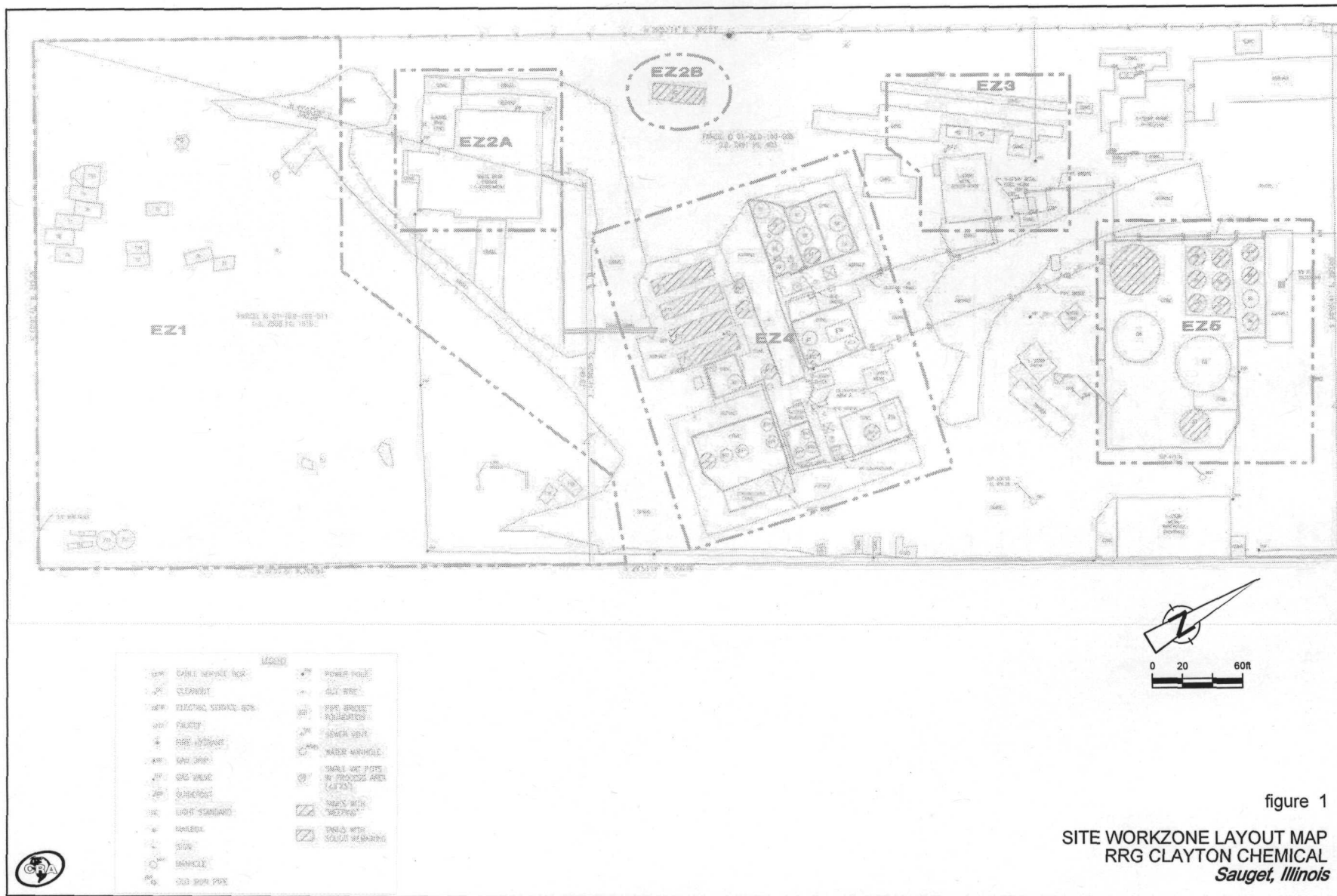
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 14, 2007	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 15, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. CRA contacted START Bob Hill via electronic mail and provided an update of the project status regarding possible re-mobilization activities and dates
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 16, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 16, 2007	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-9246), or Phil Harvey (773-380-9933) for clarification.

Attachment





## APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR FEBRUARY 19 – 23, 2007



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/74 DATE: February 26, 2007

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: Weekly Summary Of Site Activities For February 19 - 23, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the sixty-fourth week (the period February 19 through February 23, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 19, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 19, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the disposal of the EZ 4 Loading Dock soils
February 20, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 21, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 21, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 22, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
February 23, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

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<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
February 23, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

